

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI, INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC, OPENAI
GLOBAL LLC, OAI CORPORATION, LLC,
OPENAI HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendant.

ECF CASE

No. 1:23-cv-11195

**MOTION FOR ADMISSION OF
ATTORNEY PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, I, Ian B. Crosby, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Plaintiff The New York Times Company in the above-captioned action.

I am an active member in good standing of the State Bar of Washington. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached my declaration pursuant to Local Rule 1.3, as well as a certificate of good standing from the Washington Supreme Court.

Dated: January 3, 2024

/s/ Ian B. Crosby
Ian B. Crosby (*pro hac vice*)
SUSMAN GODFREY L.L.P.
401 Union Street, Suite 3000
Seattle, WA 98101
Tel.: 206-516-3880
icrosby@susmangodfrey.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify this 3rd day of January, 2024, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Ian B. Crosby

Ian B. Crosby